

The Honorable David G. Estudillo

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

ELIAS PEÑA, ISAAH HUTSON, and
RAY ALANIS,

Plaintiffs,

vs.

CLARK COUNTY, WASHINGTON,

Defendant.

Case No.: 3:21-CV-05411-DGE

**APPENDIX TO PLAINTIFFS'
OPPOSITION TO DEFENDANT CLARK
COUNTY'S MOTION FOR SUMMARY
JUDGMENT DISMISSAL**

Noted for Hearing: March 10, 2023

Oral Argument Requested

APPENDIX – EXHIBITS

| Exhibit | Description |
|----------------|---|
| Exhibit A | Excerpts of Deposition of Ray Alanis |
| Exhibit B | Excerpts of Deposition of Isaiah Hutson |
| Exhibit C | Excerpts of Deposition of Elias Pena |
| Exhibit D | Excerpts of Deposition of Allen Martinez |
| Exhibit E | Excerpts of Deposition of Edward Perez |
| Exhibit F | Excerpts of Deposition of Julio Morales |
| Exhibit G | Excerpts of Deposition of Timothy Waggoner |
| Exhibit H | Excerpts of Deposition of Marc Smith |
| Exhibit I | Excerpts of Deposition of Micah Passmore |
| Exhibit J | Excerpts of Deposition of Carolyn Heniges |
| Exhibit K | Excerpts of Deposition of Amanda Lawrence |
| Exhibit L | Excerpts of Deposition of Kara Hill |
| Exhibit M | Excerpts of Deposition of Joshua Lipscomb |
| Exhibit N | Excerpts of Deposition of Matthew Griswold |
| Exhibit O | Excerpts of Deposition of Carl K. Oman |
| Exhibit P | Excerpts of Deposition of Sue Stepan |
| Exhibit Q | Excerpts of Deposition of John May |
| Exhibit R | Excerpts of Deposition of Darrell Young Volume I and II |
| Exhibit S | Excerpts of Deposition of Isidoro Flores |
| Exhibit T | Excerpts of Deposition of Chad Weiker |
| Exhibit U | Excerpts of Deposition of Ricky Nichols |
| Exhibit V | Excerpts of Deposition of Aaren Morring |
| Exhibit W | Excerpts of Deposition of Richard Harris |
| Exhibit X | Declaration of Clayton Tikka |
| Exhibit Y | Declaration of Larry Jones |

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|---|------------|---|
| 1 | Exhibit Z | Posting – Bates Number P96 |
| 2 | Exhibit AA | Kara Hill’s Investigation Report Bates Number CC2920-CC2923 |

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4 Dated: March 6th, 2023

Respectfully submitted,

5 **MEXICAN AMERICAN LEGAL DEFENSE**
6 **AND EDUCATIONAL FUND**

7 /s/ Luis Lozada

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14 **BRESKIN, JOHNSON, TOWNSEND PLLC**

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20 *Attorneys for Plaintiffs*

CERTIFICATE OF SERVICE

I hereby certify that on March 6, 2023, I electronically transmitted the attached documents to the Clark's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to all ECF registrants in this matter.

Dated: March 6, 2023

/s Ann M. Iarossi
Ann M. Iarossi, Legal Assistant